

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)
)
)
v.) **Case No.: 2:06-cr-280-MEF**
)
JOSE VASQUES-MARTINES)
FAUSTINO-MORALES)

UNOPPOSED MOTION FOR EXPEDITED SENTENCING

COMES NOW the Defendant, by undersigned counsel, and respectfully requests that this matter be set for expedited sentencing, and moved to a date earlier than the presently scheduled date of May 22, 2007.

In support of this Motion, the Defendant would show:

1. The draft presentence report has been completed and distributed, and recommends a sentencing range which would permit a “time served” sentence.
2. The plea agreement, filed on December 27, 2006 and reached pursuant to F.R.Cr.P. 11(c)(1)(C), recommends a sentence of “time served” and an expedited sentencing.
3. The defendant does not anticipate any disputed issues at sentencing.
4. The office of the prosecuting attorney has authorized undersigned counsel to state that the Government does not oppose this motion.

WHEREFORE, Defendant prays that this Motion be granted.

Respectfully submitted,

s/Christine A. Freeman
CHRISTINE A. FREEMAN
TN BAR NO.: 11892

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CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Stephen P. Feaga, Assistant U. S. Attorney, One Court Square, Suite 201, Montgomery, Alabama 36104.

Respectfully submitted,

s/Christine A. Freeman
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